

OCT 30 1996

BARRY SKIDELSKY

Attorney at Law

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RECEIVED

William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

October 25, 1996

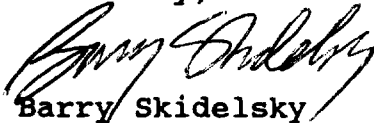
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Dear Sir:

Milstar Broadcasting Corp. ("Milstar"), by counsel, hereby submits the enclosed Comments in Support of Rule-Making No. 8883 (to permit AM radio stations to use directional antennas with parasitic and slant-wire elements).

If there are any problems or questions, please contact me; and, thanks.

Sincerely,



Barry Skidelsky

BdS:hp

encl.

cc: S. Gardos

C. Beveridge

J. Crutchfield (FCC)

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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OCT 30 1996

COMMENTS IN SUPPORT  
OF RULE-MAKING NO. 8883

RECEIVED

MILSTAR BROADCASTING CORP. ("Milstar"), by counsel, hereby submits Comments in Support of Rule-Making No. 8883, as follows.

These Comments are responsive to a Public Notice released by the Commission on October 1, 1996 (Report No. 2157), which Public Notice merely states that Milstar filed the subject Petition on August 8, 1994.

The Public Notice is not styled as a Notice of Proposed Rule-Making ("NPRM"), nor does it state a reasonable time for the filing of comments (see section 1.415 of the Commission's rules). Nonetheless, Milstar submits these Comments out of an abundance of caution, in order to avoid dismissal of its Petition <sup>1</sup>.

Thus, Milstar expresses a continuing interest in, and it incorporates by reference the contents of, its Petition. Milstar continues to believe that adequate technological justification and strong public interest considerations warrant grant of the subject Petition for Rule-Making.

Milstar also requests that the Commission take official notice of the fact that it is no longer a Commission licensee, having consummated on September 11, 1996, the sale of its sole radio station, WXCT-AM in Hamden, Connecticut (pursuant to Commission grant of BAPL-960605EA).

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<sup>1</sup> The Commission routinely dismisses Petitions for Rule-Making seeking to amend the FM Table of Allotments, where no showing of continuing interest is filed following issuance of an NPRM.

In consideration thereof, Milstar asks that the Commission substitute in and treat as the Petitioner in this proceeding for all purposes from this date forward, Milstar's engineering consultant, Communications Technologies, Inc. ("CTI")<sup>2</sup>. Counsel for the Petitioner remains unchanged.

In the alternative, Milstar requests that the Commission adopt the subject Petition on its own motion; and, that the Commission likewise move forward on this matter.

Respectfully,

MILSTAR BROADCASTING CORP.

  
by Barry Skidelisky, Esq.  
655 Madison Avenue  
19th floor  
New York, NY 10021

October 24, 1996

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<sup>2</sup> Section 1.400 defines the term "party" as any person who participates in rule-making proceeding. CTI is a party, as it not only prepared the engineering part of the original Petition, but also because it has specifically adopted these Comments.

OCT-23-1996 19:55 FROM

TO


19146936757 P.05/06

DECLARATION

I, Stephen Gardos, hereby declare under penalty of perjury, as follows.

I am President of MILSTAR BROADCASTING CORP. ("Milstar"), former FCC licensee of radio station WXCT (AM) in Hamden, Connecticut.

I have read and hereby declare my support for the foregoing Comments in Support of Rule-Making No. 8883, the contents of which are true and correct to the best of my knowledge and belief.

  
MILSTAR BROADCASTING CORP.  
by: Stephen Gardos, Pres.

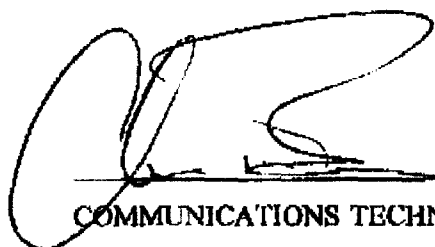
October 24, 1996

**DECLARATION**

I, Clarence M. Beverage, hereby declare under penalty of perjury, as follows.

I am president of COMMUNICATIONS TECHNOLOGIES, INC. ("CTI"), a broadcast engineering consulting firm whose qualifications and prior appearances before the Commission are a matter of public record.

I have read and hereby declare my support for the foregoing Comments in Support of Rule-Making No. 8883, the contents of which are true and correct to the best of my knowledge and belief.

  
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COMMUNICATIONS TECHNOLOGIES, INC.

by: Clarence M. Beverage, President

October 24, 1996